j. During EPA's April 12, 2005 CEI the inspector observed a damaged area of the secondary containment wall surrounding the Hazardous Waste Storage Tank. (See photographs 50 & 51) With regard to this damaged area, please answer the following:

(i) For the damaged area, please refer to the attached photos and provide a detailed description of how the damage occurred.

We are uncertain of how the damage occurred to the containment wall.

(ii) Please state the exact date on which this damage occurred and how the facility became aware of it.

We are uncertain of the exact date this damage occurred. The crack was brought to our attention during the CEI on April 12, 2005. The change of inspection personnel, additional training and periodic inspection walk-thru's by the HSE Manager will insure this does not happen again. Also, the Security Guards will check the areas during their hourly inspection rounds. Any problems will be noted on the security guards daily report, which is reviewed by the HSE Manager daily.

(iii) For both questions i and ii above, provide documentation supporting your response to each of these questions.

For question i above, we are uncertain of how the damage occurred; therefore, we can not provide documentation. For question ii above, we are uncertain of when the damage occurred; therefore, we can not provide documentation. The crack was brought to our attention during the CEI on April 12, 2005.

(iv) Has the damaged area of the secondary containment wall been repaired? If so, please provide a detailed description of how the containment wall was repaired, the date such repair occurred and photographs of the repaired secondary containment wall.

The containment wall was repaired on April 19, 2005. The cracks were patched with concrete. Attached please find photographs that show the repairs. We are evaluating alternative containment methods.

3. While inspecting the Main <90-Day Hazardous Waste Storage Area, the inspector observed the following:

a. Four (4) 5-Gal containers (See Photograph 43) One of these containers was observed to have a hazardous waste label, none of these containers was observed to be marked with an accumulation start date.

The three containers in picture #43, which did not have labels, were used to store extra bungs for drums (in case we need to put a different bung in a drum). The fourth container, marked UV, was generated in our UV development lab.

We have done additional training since the inspection stressing the importance of following the correct hazardous waste management procedures. The Waste Coordinator has been reminded of his responsibilities and duties. He has been given a detailed list of his daily duties. The hazardous waste management procedures will be closely monitored by the HSE Manager and the Waste Minimization Manager. The Waste Minimization Manager has been assigned the responsibility of being the back-up in the event the Waste Coordinator is absent. No one other than the Waste Coordinator or the Waste Minimization Manager shall remove hazardous waste from the satellite areas in the plant and QC area. This is the responsibility of the Lab Porter in the Development Lab. In his absence, the lab group leaders assume this responsibility.

(i) Please provide a detailed description of the process or processes which generated the materials in each of these containers.

The only bucket out of the four (4) that was hazardous waste was generated in our UV development lab. This material was generated through the lab disposal of sample batches and raw material evaluation.

(ii) Describe the contents of each of these containers observed during EPA's April 2005 CEI, and provide the basis of your knowledge of such contents.

The three containers in picture #43, which did not have labels, were used to store extra bungs for the drums in case we need to put a different bung in a drum. The fourth container marked UV was generated in our UV development lab. This information is based on a discussion with the Assistant Technical Director and the Chemists in the UV lab.

(iii) State whether a "waste determination" and "LDR determination" was made for the contents of each of these containers.

A waste determination and LDR was made for the contents of the container which contained hazardous waste.

(iv) If a "waste determination" and "LDR determination" were made for the contents of each of these containers, state when each such determination was made.

The waste determination was made when the decision was made to dispose of the material. The LDR was made when the material was profiled with TSD.

(v) Were the materials in any of these containers determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste in each of these containers.

The waste codes that apply to this 5 gallon bucket of material is as follows:

D001, D035, F003, F005

(vi) State in each case whether the hazardous waste determination was based on generator's knowledge of the process that generated the waste, or on analytic results. If the determination was based on analytical results, provide any and all such results.

Waste determination was based on generator knowledge of the raw material and products found in the UV Development lab's waste stream.

(vii) Were any of these containers shipped off-site for recycle (i.e., reclaim, reuse), treatment, storage or disposal?

This 5 gallon bucket of UV waste was not shipped off-site.

(viii) If any of these containers were shipped off-site, provide copies of <u>all</u> bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of any said container.

Does not apply to this 5 gallon bucket.

3. While inspecting the Main <90-Day Hazardous Waste Storage Area, the inspector observed the following:

b. Three (3) 5-Gal containers (See photographs 44 & 45) These three containers were all observed to be labeled as hazardous waste and marked with accumulation start dates. None of these containers were observed to be "closed".

(i) Please provide a detailed description of the process or processes which generated the materials in each of these containers.

The two (2) containers on picture 44 were generated in our UV development lab. This material was generated through the lab disposal of sample batches and raw material evaluation.

The one (1) container in picture #45 contains wash solvent used in the 90 day area to wash utensils. This material is reused until no longer effective as a wash solvent. It is then pumped into the main storage tank.

(ii) Describe the contents of each of these containers observed during EPA's April 2005 CEI, and provide the basis of your knowledge of such contents.

The two (2) containers in picture 44 were generated in our UV development lab. This material was generated through the lab disposal of sample batches and raw material evaluation. This information is based on a discussion with the Assistant Technical Director and the Chemists in the UV lab.

The one (1) container in picture 45 contains wash solvent used in the 90 day area to wash utensils. This material is reused until no longer effective as a wash solvent. It is then pumped into the main storage tank. This information is based on a discussion with the Waste Coordinator.

(iii) State whether a "waste determination" and "LDR determination" was made for the contents of each of these containers.

A waste determination and LDR was made for the contents of these containers which contained hazardous waste.

(iv) If a "waste determination" and "LDR determination" were made for the contents of each of these containers, state when each such determination was made.

The waste determination was made when the decision was made to dispose of the material. The LDR was made when the material was profiled with TSD.

(v) Were the materials in any of these containers determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste in each of these containers.

The waste codes for these 5 gallon buckets of waste material are as follows:

D001, D035, F003, F005

(vi) State in each case whether the hazardous waste determination was based on generator's knowledge of the process that generated the waste, or on analytic results. If the determination was based on analytical results, provide any and all such results.

For the two (2) containers in picture 44, the waste determination was based on generator knowledge of the raw materials and products found in the UV Development lab's waste stream.

For the one (1) container in picture 45, the waste determination was based on generator knowledge of the raw materials in the wash solvent.

(vii) Were any of these containers shipped off-site for recycle (i.e., reclaim, reuse), treatment, storage or disposal?

These 5 gallon buckets were not shipped off-site.

(viii) If any of these containers were shipped off-site, provide copies of <u>all</u> bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of any said container.

Does not apply to these 5 gallon buckets.

3. While inspecting the Main <90-Day Hazardous Waste Storage Area, the inspector observed the following:

c. One burlap bag (See photograph 46) This bag was observed to be labeled with a hazardous waste label. No accumulation start date was observed. With regard to each of these containers:

(i) Please provide a detailed description of the process or processes which generated the materials in each of these containers.

The burlap bag, which was identified as an obsolete raw material, was not a hazardous waste. The container was labeled incorrectly. This was corrected and removed from hazardous waste area.

(ii) Describe the contents of each of these containers observed during EPA's April 2005 CEI, and provide the basis of your knowledge of such contents.

Does not apply.

(iii) State whether a "waste determination" and "LDR determination" was made for the contents of each of these containers.

Does not apply.

(iv) If a "waste determination" and "LDR determination" were made for the contents of each of these containers, state when each such determination was made.

Does not apply.

(v) Were the materials in any of these containers determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste in each of these containers.

Does not apply.

(vi) State in each case whether the hazardous waste determination was based on generator's knowledge of the process that generated the waste, or on analytic results. If the determination was based on analytical results, provide any and all such results.

Does not apply.

(vii) Were any of these containers shipped off-site for recycle (i.e., reclaim, reuse), treatment, storage or disposal?

Does not apply.

(viii) If any of these containers were shipped off-site, provide copies of <u>all</u> bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of any said container.

Does not apply.

4 While inspecting the Product Work-Off Area, the inspector observed a pallet (See Photograph 55) of 35 (5-gal containers) The facility representative stated they were not workoffs but was unsure of their contents and their destination. Additionally, a steel container was observed that was labeled "LAC BAGS". (See Photograph 54) The facility representative stated that this container should be labeled as hazardous waste and moved to the <90-Day Hazardous Waste Storage Area. With regard to each of these containers:

The Waste Minimization Manager was still in the process of determining whether the 35 – 5 gallon containers of material could be worked off into other batches. This pallet of 5 gallon containers were from out-of-spec batches from the Paint Department. These materials are not hazardous waste; therefore, the questions do not apply.

The container of lacquer bags should have been marked hazardous waste and placed in the 90 day storage area. A waste determination was made when the filters could not be used to filter any more material. Having one person responsible for removing hazardous waste from the satellite accumulation areas and making sure it is properly labeled, dated and properly placed in the less than 90 day storage area will eliminate this situation from happening again.

(a) Please provide a detailed description of the process or processes which generated the materials in each of these containers.

The lacquer bags (filters) are generated through filtering the finished product prior to entering the shipping container.

(b) Describe the contents of each of these containers observed during EPA's April 2005 CEI, and provide the basis of your knowledge of such contents.

The contents were finished products and wash solvent. The basis for knowledge is generator knowledge of the products manufactured in that department.

(c) State whether a "waste determination" and "LDR determination" was made for the contents of each of these containers.

A waste determination and LDR was made.

(d) If a "waste determination" and "LDR determination" were made for the contents of each of these containers, state when each such determination was made.

A waste determination was made when the filter could not be used to filter any more material. The LDR was made when material was profiled with TSD.

(e) Were the materials in any of these containers determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste in each of these containers.

The materials in the lacquer bag drum are considered to be hazardous. The waste codes for the lacquer bag drum are as follows:

D001, D035, F003, F005

(f) State in each case whether the hazardous waste determination was based on generator's knowledge of the process that generated the waste, or on analytic results. If the determination was based on analytical results, provide any and all such results.

Determination is based on generators knowledge of the products and wash solvents being filtered through the filters.

(g) Were any of these containers shipped off-site for recycle (i.e., reclaim, reuse), treatment, storage or disposal?

Yes, these containers are shipped off-site to be disposed of.

(h) If any of these containers were shipped off-site, provide copies of <u>all</u> bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of any said container.

See attached documents.

4A

SC-02

South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.
2600 Bull Street, Columbia, SC 29201
Phone: (803) 896-4000
Emergency & Holidays: (803) 253-6488

146435 PLEASE PRINT or TYPE (Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID No. VAD000019828 — Manifest Document No. 85679 — 2. Page 1 of 1

Information in the shaded areas is not required by Federal law, but is by State law.

3. Generator's Name and Mailing Address
AKZO NOBEL - ROANOKE
PO BOX 4627
ROANOKE VA 24015
Attention: SAM WINKLER
4. Generator's Phone (540-855-3302

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: ENVIRONMENTAL OPTIONS INC
6. U.S. EPA ID Number: VA0000122994
C. State Transporter's ID
D. Transporter's Phone: 540-483-3920

7. Transporter 2 Company Name: Freehold Cartage Inc
8. U.S. EPA ID Number: NSD054126164
E. State Transporter's ID
F. Transporter's Phone: 732-462-1001

9. Designated Facility Name and Site Address
WASTE TECHNOLOGIES INDUSTRIES
1250 ST GEORGE ST
EAST LIVERPOOL, OH 43920
10. U.S. EPA ID Number: OHD980613541
G. State Facility's ID
H. Facility's Phone: 800-495-4162

11. U.S. Dot Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste Number
RQ, a. WASTE FLAMMABLE SOLID, ORGANICS, N.O.S. (METHYL ETHYL KETONE, ACETONE), 4.1, UN1325, PGIII	019 20	DM	07,350	P	F005 F003
b.					
c.					
d. T68504					

J. Additional Descriptions for Materials Listed Above — Applicable EPA Waste Codes
A. SE-ANRV 020-F005 F005 F003 D001 D035
B.
C.
D.

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
Pick up site:
2837 ROANOKE AVENUE SW
ROANOKE, VA 24015

CHEMTREC EMERGENCY NUMBER 1-800-424-9300
If undeliverable, contact generator

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

GENERATOR

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: ~~SAM WINKLER~~ STEVE OSEN — Signature — Month 06 Day 02 Year 05

TRANSPORT

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Type Name: Jonathan Angle — Signature — Month 06 Day 02 Year 05

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: DAVID Fleming — Signature — Month 06 Day 03 Year 05

FACILITY

19. Discrepancy Indication Space
a [ ] lbs. c [ ] lbs.
b [ ] lbs. d [ ] lbs.

20. Facility Owner or Operator; Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: CHRISTOPHER — Signature — Month 06 Day 06 Year 05

LAB PACK LAND DISPOSAL RESTRICTION (LDR)
CONTINUATION FORM

Generator Name: **Akzo Nobel**

US EPA ID No.: **VAD000019828**

Manifest Doc. No.: **85679 / 146435**

State Manifest No.:

Manifest Page No.(Nos.) and Line Item(s): Page 1 Line A

Circle the waste codes that apply:

D001	F032	K061	K149	P059	P188	U041	U096	U154	U210
D002	F034	K064	K150	P060	P189	U042	U097	U155	U211
D003	F035	K065	K151	P062	P190	U043	U098	U156	U213
D004	F037	K066	K169	P064	P191	U044	U099	U157	U214
D005	F038	K069	K170	P065	P192	U045	U101	U158	U215
D006	K001	K073	K171	P066	P194	U046	U102	U159	U216
D007	K002	K083	K172	P067	P196	U047	U103	U160	U217
D008	K007	K084	P001	P068	P197	U048	U105	U161	U218
D010	K008	K085	P002	P069	P198	U049	U106	U162	U219
D011	K009	K086	P003	P070	P199	U050	U107	U163	U220
D012	K010	K087	P004	P071	P201	U051	U108	U164	U221
D013	K011	K088	P005	P072	P202	U052	U109	U165	U222
D014	K013	K090	P006	P073	P203	U053	U110	U166	U223
D015	K014	K091	P007	P074	P204	U055	U111	U167	U225
D016	K015	K093	P008	P075	P205	U056	U112	U168	U226
D018	K016	K094	P009	P077	U001	U057	U113	U169	U227
D019	K017	K095	P013	P081	U002	U058	U114	U170	U228
D020	K018	K096	P014	P082	U003	U059	U115	U171	U234
D021	K019	K097	P015	P084	U004	U060	U116	U172	U235
D022	K020	K098	P016	P085	U005	U061	U117	U173	U236
D023	K021	K101	P017	P087	U006	U062	U118	U174	U237
D024	K022	K102	P018	P088	U007	U063	U119	U176	U238
D025	K023	K103	P020	P089	U008	U064	U120	U177	U239
D026	K024	K104	P021	P092	U009	U066	U121	U178	U240
D027	K025	K105	P022	P093	U010	U067	U122	U179	U243
D028	K026	K107	P023	P094	U011	U068	U123	U180	U244
D029	K027	K108	P024	P097	U012	U069	U124	U181	U246
D030	K028	K109	P026	P098	U014	U070	U125	U182	U247
D031	K029	K110	P027	P099	U015	U071	U126	U183	U248
D032	K030	K111	P028	P101	U016	U072	U127	U184	U249
D033	K031	K112	P029	P102	U017	U073	U128	U185	U271
D034	K032	K113	P030	P103	U018	U074	U129	U186	U278
D035	K033	K114	P034	P104	U019	U076	U130	U187	U279
D036	K034	K115	P036	P105	U020	U077	U131	U188	U280
D038	K035	K116	P037	P106	U021	U078	U132	U189	U328
D039	K036	K117	P038	P108	U022	U079	U133	U190	U353
D040	K037	K118	P039	P109	U023	U080	U136	U191	U359
D043	K038	K123	P040	P110	U024	U081	U137	U192	U364
F001	K039	K124	P041	P111	U025	U082	U138	U193	U367
F002	K040	K125	P042	P113	U026	U083	U140	U194	U372
F003	K041	K126	P043	P114	U027	U084	U141	U196	U373
F004	K042	K131	P044	P115	U028	U085	U142	U197	U387
F005	K044	K132	P045	P116	U029	U086	U143	U200	U389
F006	K045	K136	P046	P118	U030	U087	U144	U201	U394
F007	K046	K141	P047	P119	U031	U088	U145	U202	U395
F008	K047	K142	P048	P120	U032	U089	U146	U203	U404
F009	K048	K143	P049	P121	U034	U090	U147	U204	U409
F010	K049	K144	P050	P122	U035	U091	U148	U205	U410
F011	K050	K145	P051	P123	U036	U092	U149	U206	U411
F012	K051	K147	P054	P127	U037	U093	U150	U207	
F024	K052	K148	P057	P128	U038	U094	U152	U208	
F025	K060		P058	P185	U039	U095	U153	U209	

LAB PACK LAND DISPOSAL RESTRICTION (LDR)
NOTICE AND CERTIFICATION

Generator Name: **Akzo Nobel**

US EPA ID No.: **VAD000019828**

Manifest Doc. No.: **85679 / 146435**

State Manifest No.:

Manifest Page No.	Line Item	Waste Codes[1]
Pg 1 line 1 (ANRV 020)	A	F005
Pg 1 line 1 (ANRV 020)	A	F003
Pg 1 line 1 (ANRV 020)	A	D001
Pg 1 line 1 (ANRV 020)	A	D035

Manifest Page No.	Line Item	Waste Codes[1]

[1] To list additional waste codes that won't fit in this space, complete a Lab Pack LDR Continuation Form (LABPACK2).

As required by 40 CFR 268.7(a)(9), the following certification is made for these wastes subject to the LDR:

I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only wastes that have not been excluded under Appendix IV to 40 CFR Part 268 and that this lab pack will be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR §268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

STEVE OSEN
Printed/Typed Name

Authorized Signature

6/2/05
Date

5 While inspecting the Stain section of the Manufacturing Building the inspector observed liquid on the floor that the facility representative for this area stated was left over after product transfer and tank cleaning. (See Photographs 29 & 30) The representative further stated that the material on the floor is usually cleaned up and disposed of after transfer. With regard to this material:

(a) Please provide a detailed description of the process or processes which generated the material(s) observed.

Based on a discussion with the Production Manager, the materials in picture #29 and 30 were generated during a fill-off operation. The process involves filling drums with finished product from the mixing container. The material on the floor was due to a leaking valve on the batch tank. All employees have been instructed to clean up all spills immediately.

There are times when spilled material can be recovered and is not a waste. Since not all spilled material becomes waste, the first decision is to determine whether the material is to be saved or disposed of. If the decision is made to dispose of the material, it becomes a waste at that point.

(b) Provide a detailed description of the procedure employed to collect these material(s) into containers. Include a list of all equipment that is used.

When a spill occurs and the material can not be recovered, the decision is made to dispose of the material. At this point, the spill is covered with an absorbent. When the material is absorbed, the absorbent is swept into plastic shovels using a broom and placed into solid hazardous waste drums, labeled properly and sent to the 90 day storage area.

(c) Describe the contents of this material observed during EPA's April 2005 CEI, and provide the basis of your knowledge of such contents.

The contents were finished products from the Stain Department. The basis for knowledge is generator knowledge of the products manufactured in the Stain Department.

(d) State whether a "waste determination" and "LDR determination" was made for the contents of each of these containers.

A waste determination and LDR was made.

(e) If a "waste determination" and "LDR determination" were made for the contents of each of these containers, state when each such determination was made.

This material was determined to be a hazardous waste when the decision was made to dispose of the material instead of trying to save it. The LDR was made when material was profiled with TSD.

(f) Was the material observed in Photograph 29 determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste in each of these containers.

The materials were determined to be hazardous waste. The waste codes for the spill in the Stain Department were as follows:

D001, D035, F003, F005

(g) State in each case whether the hazardous waste determination was based on generator's knowledge of the process that generated the waste, or on analytic results. If the determination was based on analytical results, provide any and all such results. If this waste fits a profile for a specific waste stream, provide the analytical results for the specific profile.

Determination is based on generators knowledge of the process that generated the waste and the stain products being made in that department.

6 While inspecting the Lacquer section of the Manufacturing Building the inspector observed a 55 gallon container labeled as "Filter Drum". It was noted that the container was not closed and that a hose was draped into the container (See Photograph 35).

(a) Please provide a detailed description of the process or processes which generated the material(s) observed.

The process that generated the filters is a fill-off operation. Finished products are filtered prior to being put into the shipping container.

(b) Describe the contents of this material observed during EPA's April 2005 CEI, and provide the basis of your knowledge of such contents.

The contents were finished products from the Lacquer Department. The basis for knowledge is generator knowledge of the products manufactured in the Lacquer Department.

(c) State whether a "waste determination" and "LDR determination" was made for the contents of this container.

A waste determination and LDR was made.

(d). If a "waste determination" and "LDR determination" were made for the contents of each of these containers, state when each such determination was made.

The waste determination was made when the filter was no longer usable. The LDR was made when material was profiled with TSD.

(e) Were the materials in this container determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste in each of these containers.

The materials were determined to be hazardous waste. The waste codes for this material in the Lacquer Department were as follows:

D001, D035, F003, F005

(f) State in each case whether the hazardous waste determination was based on generator's knowledge of the process that generated the waste, or on analytical results. If the determination was based on analytical results, provide any and all such results.

Determination is based on generators knowledge of the products being filtered in the Lacquer Department.

(g) Were any of these containers shipped off-site for recycle (i.e., reclaim, reuse), treatment, storage or disposal?

The container would have been shipped off-site for disposal.

(h) If any of these containers were shipped off-site, provide copies of <u>all</u> bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of any said container.

See attached documents.

(i) Explain the function of the hose that was observed draped into the container. Be sure to include a statement as to whether any material(s) are being added to the container from this hose. If so, provide a full description of each and every material being added from the hose and the source of these materials.

The hose had been used to fill-off finished material. The hose was hung on the side of the drum to elevate the hose to prevent residual material from running out of the hose. Through additional training, employees have been informed that drums of hazardous waste can not be used for this purpose. A new method of handling the hose has been implemented. The hose is currently being hung up in the Lacquer Department.

South Carolina Department of Health and Environmental Control

6H

Bureau of Solid & Hazardous Waste Mgt.
2600 Bull Street, Columbia, SC 29201
Phone: (803) 896-4000
Emergency & Holidays: (803) 253-6488

146435 PLEASE PRINT or TYPE (Form designed for use on elite [12-pitch] typewriter) Form Approved. OMB No. 2050-0039 Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID No. VAD000019828 | Manifest Document No. 85679 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law, but is by State law.

GENERATOR

3. Generator's Name and Mailing Address
AKZO NOBEL - ROANOKE
PO BOX 4627
ROANOKE VA 24015
Attention: SAM WINKLER
4. Generator's Phone (540) 855-5302

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: ENVIRONMENTAL OPTIONS INC
6. U.S. EPA ID Number: VAD000122994

C. State Transporter's ID
D. Transporter's Phone

7. Transporter 2 Company Name
8. U.S. EPA ID Number

E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
WASTE TECHNOLOGIES INDUSTRIES
1250 ST GEORGE ST
EAST LIVERPOOL, OH 43920
10. U.S. EPA ID Number: OHD980613541

G. State Facility's ID
H. Facility's Phone

11. U.S. Dot Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste Numbers
RQ, a. WASTE FLAMMABLE SOLID, ORGANICS, N.O.S. (METHYL ETHYL KETONE, ACETONE), 4.1, UN1325, PGIII	019	DM	07,350	P	F005 F003
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
Pick up site:
2837 ROANOKE AVENUE SW
ROANOKE, VA 24015

CHEMTREC EMERGENCY NUMBER 1-800-424-9300
If undeliverable, contact generator

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
SAM WINKLER STEVE OSEN	Steve Osen	06	02	05

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Type Name	Signature	Month	Day	Year
Tom Hargrave		06	02	05

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

a [ ] lbs. c [ ] lbs.
b [ ] lbs. d [ ] lbs.

20. Facility Owner or Operator; Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name	Signature	Month	Day	Year

EPA Form 8700 (Rev. 9/88) Previous Editions are Obsolete [DHEC 1988 (Rev. 6-97)] GENERATOR COPY

LAB PACK LAND DISPOSAL RESTRICTION (LDR) CONTINUATION FORM

Generator Name: **Akzo Nobel**

US EPA ID No.: **VAD000019828**

Manifest Doc. No.: **85679 / 146435**

State Manifest No.:

Manifest Page No.(Nos.) and Line Item(s): page 1 line A

Circle the waste codes that apply:

D001	F032	K061	K149	P059	P188	U041	U096	U154	U210
D002	F034	K064	K150	P060	P189	U042	U097	U155	U211
D003	F035	K065	K151	P062	P190	U043	U098	U156	U213
D004	F037	K066	K169	P064	P191	U044	U099	U157	U214
D005	F038	K069	K170	P065	P192	U045	U101	U158	U215
D006	K001	K073	K171	P066	P194	U046	U102	U159	U216
D007	K002	K083	K172	P067	P196	U047	U103	U160	U217
D008	K007	K084	P001	P068	P197	U048	U105	U161	U218
D010	K008	K085	P002	P069	P198	U049	U106	U162	U219
D011	K009	K086	P003	P070	P199	U050	U107	U163	U220
D012	K010	K087	P004	P071	P201	U051	U108	U164	U221
D013	K011	K088	P005	P072	P202	U052	U109	U165	U222
D014	K013	K090	P006	P073	P203	U053	U110	U166	U223
D015	K014	K091	P007	P074	P204	U055	U111	U167	U225
D016	K015	K093	P008	P075	P205	U056	U112	U168	U226
D018	K016	K094	P009	P077	U001	U057	U113	U169	U227
D019	K017	K095	P013	P081	U002	U058	U114	U170	U228
D020	K018	K096	P014	P082	U003	U059	U115	U171	U234
D021	K019	K097	P015	P084	U004	U060	U116	U172	U235
D022	K020	K098	P016	P085	U005	U061	U117	U173	U236
D023	K021	K101	P017	P087	U006	U062	U118	U174	U237
D024	K022	K102	P018	P088	U007	U063	U119	U176	U238
D025	K023	K103	P020	P089	U008	U064	U120	U177	U239
D026	K024	K104	P021	P092	U009	U066	U121	U178	U240
D027	K025	K105	P022	P093	U010	U067	U122	U179	U243
D028	K026	K107	P023	P094	U011	U068	U123	U180	U244
D029	K027	K108	P024	P097	U012	U069	U124	U181	U246
D030	K028	K109	P026	P098	U014	U070	U125	U182	U247
D031	K029	K110	P027	P099	U015	U071	U126	U183	U248
D032	K030	K111	P028	P101	U016	U072	U127	U184	U249
D033	K031	K112	P029	P102	U017	U073	U128	U185	U271
D034	K032	K113	P030	P103	U018	U074	U129	U186	U278
D035	K033	K114	P034	P104	U019	U076	U130	U187	U279
D036	K034	K115	P036	P105	U020	U077	U131	U188	U280
D038	K035	K116	P037	P106	U021	U078	U132	U189	U328
D039	K036	K117	P038	P108	U022	U079	U133	U190	U353
D040	K037	K118	P039	P109	U023	U080	U136	U191	U359
D043	K038	K123	P040	P110	U024	U081	U137	U192	U364
F001	K039	K124	P041	P111	U025	U082	U138	U193	U367
F002	K040	K125	P042	P113	U026	U083	U140	U194	U372
F003	K041	K126	P043	P114	U027	U084	U141	U196	U373
F004	K042	K131	P044	P115	U028	U085	U142	U197	U387
F005	K044	K132	P045	P116	U029	U086	U143	U200	U389
F006	K045	K136	P046	P118	U030	U087	U144	U201	U394
F007	K046	K141	P047	P119	U031	U088	U145	U202	U395
F008	K047	K142	P048	P120	U032	U089	U146	U203	U404
F009	K048	K143	P049	P121	U034	U090	U147	U204	U409
F010	K049	K144	P050	P122	U035	U091	U148	U205	U410
F011	K050	K145	P051	P123	U036	U092	U149	U206	U411
F012	K051	K147	P054	P127	U037	U093	U150	U207	
F024	K052	K148	P057	P128	U038	U094	U152	U208	
F025	K060		P058	P185	U039	U095	U153	U209	

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LAB PACK LAND DISPOSAL RESTRICTION (LDR)
NOTICE AND CERTIFICATION

Generator Name: **Akzo Nobel**

US EPA ID No.: **VAD000019828**

Manifest Doc. No.: **85679 / 146435**

State Manifest No.:

Manifest Page No.	Line Item	Waste Codes[1]
Pg 1 line 1 (ANRV 020)	A	F005
Pg 1 line 1 (ANRV 020)	A	F003
Pg 1 line 1 (ANRV 020)	A	D001
Pg 1 line 1 (ANRV 020)	A	D035

Manifest Page No.	Line Item	Waste Codes[1]

[1] To list additional waste codes that won't fit in this space, complete a Lab Pack LDR Continuation Form (LABPACK2).

As required by 40 CFR 268.7(a)(9), the following certification is made for these wastes subject to the LDR:

I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only wastes that have not been excluded under Appendix IV to 40 CFR Part 268 and that this lab pack will be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR §268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

STEVE OSEN
Printed/Typed Name

Authorized Signature

6/2/05
Date

LABPACK1 (7/13/1999)

7 While inspecting the UV Manufacturing building, the inspector observed a 5- gal container that held used rags. The container was not observed to be labeled as hazardous waste. (See Photograph 36) With regard to this container:

We utilize a process with our cleaning service (who we purchase these rags from) where our used rags are picked up, cleaned, recycled and returned to us for use.

(a) Please provide a detailed description of the process or processes which generated the materials observed.

The dirty rags are generated through clean-up operations. All dirty rags are placed into 55-gallon drums and picked up by the cleaning service we purchase the rags from.

(b) Describe the contents of this material observed during EPA's April 2005 CEI, and provide the basis of your knowledge of such contents.

The contents were soiled rags from the UV Department. The basis for knowledge is generator knowledge of these used rags in the UV Department.

(c) State whether a "waste determination" and "LDR determination" was made for the contents of this container.

A waste determination and LDR determination was not made on these rags. The container was not marked hazardous waste because it is not a hazardous waste. We utilize a process with our cleaning service (who we purchase these rags from) where our used rags are picked up, cleaned, recycled and returned to us for use.

(d). If a "waste determination" and "LDR determination" were made for the contents of each of these containers, state when each such determination was made.

Does not apply.

(e) Were the materials in this container determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste in each of these containers.

These rags were determined not to be hazardous waste.

(f) State whether the hazardous waste determination was based on the generator's knowledge of the process that generated the waste, or on analytical results. If the determination was based on analytical results, provide any and all such results.

Does not apply.

(g) Were any of these containers shipped off-site for recycle (i.e., reclaim, reuse), treatment, storage or disposal?
Does not apply.

(h) If any of these containers were shipped off-site, provide copies of <u>all</u> bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of any said container.

Does not apply.

8 While inspecting the individual laboratories in the Main Office and Research and Development building, the inspector observed a open 5-gal container in each of: Lacquer Lab #2 (Photograph 4), Lacquer Lab #1 (Photograph 6), UV Lab (Photograph 9) and the Large Workroom (Photograph 13). The open container in Lacquer Lab #1 and in the large workroom were additionally observed to not be labeled as Hazardous Waste. With regard to each of these containers:

The processes regarding hazardous waste are the same for all the individual laboratories.

(a) Please provide a detailed description of the process or processes which generated the material(s) observed.

The process creating hazardous waste in the Lacquer Labs 1 & 2 (Photographs 4 & 6) involves testing of experimental raw materials, making small batches (usually less than one gallon) of products and washing utensils and mixing pots.

Additional training has been conducted with the lab employees. Everyone has been instructed to keep all waste containers closed when not adding material. Screen devices have been lowered in the container which allow for draining containers without the lid being open on the satellite container. The group leader of each lab has been assigned the responsibility of proper hazardous waste management for their lab.

(b) Describe the contents of this material observed during EPA's April 2005 CEI, and provide the basis of your knowledge of such contents.

The contents were finished products and wash solvent from each Laboratory. The basis for knowledge is generator knowledge of the finished products and wash solvents used in the Laboratories.

(c) State whether a "waste determination" and "LDR determination" was made for the contents of this container.

A waste determination and LDR was made.

(d). If a "waste determination" and "LDR determination" were made for the contents of each of these containers, state when each such determination was made.

The waste determination was made when the chemist decided the finished products and wash solvents no longer serve a useful purpose. The LDR was made when material was profiled with TSD.

(e) Were the materials in this container determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste in each of these containers.

The materials were determined to be hazardous waste. The waste codes for this material in these Laboratories were as follows:

D001, D035, F003, F005

(f) State in each case whether the hazardous waste determination was based on generator's knowledge of the process that generated the waste, or on analytical results. If the determination was based on analytical results, provide any and all such results.

Determination is based on generators knowledge of the products and wash solvent being used in the Laboratories.

(g) Were any of these containers shipped off-site for recycle (i.e., reclaim, reuse), treatment, storage or disposal?

These containers are emptied daily into a less than 90-day storage drum located in the lab shed. The containers are returned to the labs to be used again.

(h) If any of these containers were shipped off-site, provide copies of <u>all</u> bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of any said container.

Does not apply.

9 While inspecting the Physical Testing Laboratory in the Main Office and Research and Development building, the inspector observed a 5-gal container labeled as "Hazardous Waste" and "Mercury Waste". (See Photograph 5) This container was observed not to be closed at the time of inspection. The facility representative stated that broken thermometers from the various labs in this building are collected here. He further stated that they would be under the control of the Technical Director of the Laboratory. With regard to this containers:

(a) Please provide a detailed description of the process or processes which generated the material(s) observed.

The mercury in the container comes from broken thermometers. The thermometers are used for checking temperatures on products. When broken, the thermometer is placed in the 5 gallon container, which is set up as a Physical Lab satellite point.

It has been decided that the only mercury thermometers we use will be for calibration purposes. In the event a mercury thermometer is broken, the Assistant Technical Director will notify the HSE Manager, who will arrange for proper disposal. The broken thermometer and mercury will be placed in a special mercury holding lab pack and placed in the Physical Lab satellite area. .

(b) Describe the contents of this material observed during EPA's April 2005 CEI, and provide the basis of your knowledge of such contents.

The contents were small amounts of mercury and broken glass. The basis for knowledge is based on a discussion with the Assistant Technical Director.

(c) State whether a "waste determination" and "LDR determination" was made for the contents of this container.

A waste determination and LDR was made.

(d). If a "waste determination" and "LDR determination" were made for the contents of each of these containers, state when each such determination was made.

The waste determination was made when the thermometer was broken. The LDR was made when material was profiled with TSD.

(e) Were the materials in this container determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste in each of these containers.

The materials were determined to be hazardous waste. The waste code for this material was as follows:

D009

(f) State in each case whether the hazardous waste determination was based on generator's knowledge of the process that generated the waste, or on analytical results. If the determination was based on analytical results, provide any and all such results.

Determination is based on generators knowledge of the contents of the thermometers.

(g) Were any of these containers shipped off-site for recycle (i.e., reclaim, reuse), treatment, storage or disposal?

The container was shipped off-site for disposal.

(h) If any of these containers were shipped off-site, provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of any said container.

See attached documents.

9H

380A

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. VADOOB509828 | Manifest Document No. 19317 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address
AK70
PO BOX 4627
ROANOKE VA 24015
4. Generator's Phone (540-989-8304

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: ENVIRONMENTAL OPTIONS, INC.
6. US EPA ID Number: VA0000122994
C. State Transporter's ID
D. Transporter's Phone 800-483-3920

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
ENVIRONMENTAL ENTERPRISES INC
4650 SPRING GROVE AVENUE
CINCINNATI OH 45232
10. US EPA ID Number: OHD083377010
G. State Facility's ID
H. Facility's Phone 513-541-1823

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S., 9, NA3077, PG III (MERCURY)	X	001	DF	00.005	P	D009
b. WASTE FLAMMABLE LIQUID, N.O.S., 3, UN1993, PG II (ETHYL BENZENE)	X	001	DF	00005	P	D001
c.						
d.						

J. Additional Descriptions for Materials Listed Above
a. Profile X70998 MERCURY THERMOMETERS 2000 ERG # 171 - 5gal
b. Profile X70997-5 FLAMMABLE FLAR PACK 2000 ERG # 128 - 5gal
a) 05-13433 b) 05-13434

K. Handling Codes for Wastes Listed Above
H141
H061

15. Special Handling Instructions and Additional Information
24-Hour Emergency Phone: CHEM TEL 800-255-3924
Generator Physical Address:
2837 ROANOKE AVE
ROANOKE, VA 24015

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Sam Winkler | Signature | Month Day Year: 05 13 05

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: RON DECRIST | Signature | Month Day Year: 05 13 05

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Steve McClellan | Signature | Month Day Year: 05 17 05

Style F15 LABELMASTER® (800) 621-5808 www.labelmaster.com

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

PRINTED ON RECYCLED PAPER USING SOYBEAN INK PRINTED WITH SOY INK

ORIGINAL - RETURN TO GENERATOR

GENERATOR COP

ENVIRONMENTAL ENTERPRISES, INC.
RESTRICTED WASTE NOTIFICATION & CERTIFICATION

Generator: AKZO **MANIFEST NO 19317** State Manifest No:_____.

This shipment contains waste(s) restricted from land disposal under 40 CFR Part 268 and OAC Chapter 3745-59. A copy of this notice and all supporting analysis must be kept for three (3) years.

INSTRUCTIONS:

Column 1: List all waste codes that apply to this waste.

Column 2: Mark the appropriate treatability Group that applies to the waste at the point of Generation. Wastewater is <1% total Suspended solids and <1% total organic carbon, NWW (Non-Waste Water) or WW (Waste Water)

Column 3: Enter legend if any for the subcategory that applies to this waste from the subcategory list on page 2 of this form.

Column 4: Enter the letter of the appropriate paragraph from pages 1 & 2 of this form

Column 5: If D001-D043, enter the Reference # for All underlying hazardous constituents that may be present in the waste. If F001-F005, enter the Reference # of the constituents of concern from the attached: EEI's Restricted Waste Notification & Certificate for Underlying Hazardous Constituent Treatment Standards.

EEI Profile Number	1. Waste Code	2. Treatability Group	3. Subcategory Legend (if any)	4. How Waste must be Managed (A-N)	5. Reference # of hazardous constituents in waste (complete for F001-F005 & D001-D043), Soil & Debris
	D009	NWW		A	250
	D001	NWW		A	

FOR ADDITIONAL PROFILES, USE ATTACHED CONTINUATION FORM.

CERTIFICATION! (Please sign)

The information provided is true and correct and is based on analysis of a representative sample of the waste in accordance with EPA guidelines Document SW-846 EPA 60012-80018 or on my thorough knowledge of the waste.

Signature [signature] Title HSE Manager Date 5-13-05

HOW WASTE MUST BE MANAGED

A. RESTRICTED WASTE REQUIRING TREATMENT TO THE APPROPRIATE TREATMENT STANDARD
This shipment contains restricted waste that must be treated to comply with applicable treatment standards and/or prohibitions prior to land disposal.

B. RESTRICTED WASTE THAT CAN BE LANDFILLED WITHOUT FURTHER TREATMENT
This shipment contains a restricted waste that meets the applicable treatment standards and/or prohibition levels and can be landfilled without further treatment. I have attached all available supporting data. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CRF part 268 Subpart D, in Rules 3745-59-40 to 3745-59-44 of the Administrative Code, and all applicable prohibitions set forth in 40 CFR 268.32, and Rules 3745-59-32 of the Administrative Code or Section 3004(d) of RCRA. I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment." Evaluation of this waste is based upon:____Analysis (attached)____Knowledge of waste (materials used/process employed)

C. RESTRICTED WASTE TREATMENT TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that the waste complies with the treatment standards specified in 40 CFR part 268 Subpart D, (and) in Rules 3745-59-32 to 3745-59-44 of the Administrative Code, and all applicable prohibitions set forth in 40 CFR 268.32 and in Rule 3745-59-32 of the Administrative Code or Section 3004(d) of RCRA without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

D. RESTRICTED WASTE FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY) "I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42 and rule 3745-59-42 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fines and imprisonment."

E. CHARACTERISTIC WASTE TREATED TO REMOVE HAZARDOUS CHARACTERISTICS THAT REQUIRES ADDITIONAL TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS (Reference Underlying Hazardous Constituent Form.) "I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This de-characterized waste contains underlying hazardous constituents that require further treatment to meet Universal Treatment Standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

F. LAB PACK QUALIFYING FOR ALTERNATIVE CERTIFICATION UNDER 40 CFR 268.
Hazardous waste with the following waste codes may not be placed in lab packs under alternate treatment standards of 168.42 (INCIN) D009, K019, K003, K004, K005, K006, K071, KI00, K106, P010, P011, P012, P076, P078, U134 and U151."I certify under penalty of law that I have personally examined and am familiar with the waste and that the lab pack contains only wastes which have been excluded under Appendix IV to 40 CFR part 268 or solid wastes not subject to regulation under 40 CFR part261. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

G. THIS RESTRICTED DEBRIS HAS BEEN TREATED IN ACCORDANCE WITH 40 CFR 268.45. "I certify under penalty of law that the debris has been treated in accordance with the requirements of 40 CFR 268.45. I am aware that there are significant penalties for making false certification, including the possibility of a fine and imprisonment."

H.

I. THIS LAB PACK DOES NOT CONTAIN ANY WASTE IDENTIFIED AT APPENDIX IV TO PART 268. "I certify under penalty of law that I personally have examined and am familiar with the waste and that the statement above is true and that this lab pack will be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting a false certification including possibility of fine and imprisonment."

J. THIS RESTRICTED WASTE HAS BEEN TREATED TO REMOVE THE HAZARDOUS CHARACTERISTIC. "I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This de-characterized waste contains underlying hazardous constituents that require further treatment to meet universal treatment standards. I am aware that there are significant penalties for submitting a false certification including possibility of fine and imprisonment."

K. THIS RESTRICTED WASTE HAS BEEN TREATED TO REMOVE THE HAZARDOUS CHARACTERISTIC AND BEEN TREATED FOR UNDERLYING HAZARDOUS CONSTITUENTS. "I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic and that underlying hazardous constituents, as defined in 268.48 Universal Treatment Standards. I am aware that there are significant penalties for submitting a false certification including possibility of fine and imprisonment."

L. THIS RESTRICTED WASTE IS SUBJECT TO AN EXEMPTION FROM LAND DISPOSAL. (Please include the date the waste is subject to the prohibitions in Column 4) This waste is subject to an exemption from a prohibition on the type of land disposal method utilized for the waste (such as, but not limited to, a case-by-case extension under 40 CFR 268.5, an exemption under 40 CFR 268.6, or a nationwide capacity variance under 40 CFR 269 Subpart C)

M. THIS DECHARACTERIZED WASTE CONTAINS UNDERLYING HAZARDOUS CONSTITUENTS THAT REQUIRE FURTHER TREATMENT TO MEET UNIVERSAL TREAMENT STANDARDS. "I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristics. I am aware that there are significant penalties for submitting a false certification including possibility of fine and imprisonment."

For M, circle the appropriate response for the 3 *italicized* options:

N. THIS CONTAMINATED SOIL *DOES/DOES NOT* (CIRCLE ONE) **CONTAIN LISTED HAZARDOUS WASTE AND *DOES/DOES NOT*** (CIRCLE ONE) **EXHIBIT A CHARACTERISTIC OF HAZARDOUS WASTE AND *IS SUBJECT TO/COMPLIES WITH*** (CIRCLE ONE) **THE SOIL TREATMENT STANDARDS.** "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and believe that it has been maintained and operated properly so as to comply with treatment standards specified in 40 CFR 268.49 without impermissible dilution of the prohibited wastes. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

O. THIS HAZARDOUS DEBRIS IS SUBJECT TO THE ALTERNATIVE TREATMENT STANDARDS OF 40 CFR 268.45

F001-F005 Spent Solvent Treatment Standards: Please see attached 'EEI's Restricted Waste Notification & Certificate for Underlying Hazardous Constituent Treatment Standards' for treatment standard

F001 & F002

- **44)** Carbon Tetrachloride
- **48)** Chlorobenzene
- **81)** 1,2 Dichlorobenzene
- **157)** Methylene Chloride
- **214)** Tetrachloroethylene
- **225)** 1,1,1 Trichloroethane
- **226)** 1,1,2 Trichloroethane
- **233)** 1,1,2 Trichloro-1,2,2 Trifluoroethane
- **227)** Trichloroethylene
- **228)** Trichlorofluoromethane

F003

- **4)** Acetone
- **35)** n-Butyl Alcohol
- **68)** Cyclohexanone
- **121)** Ethyl Acetate
- **122)** Ethyl Bezene
- **124)** Ethyl Ether
- **150)** Methanol
- **159)** Methyl Isobutyl Ketone
- **238)** Xylene

F004

- **65 & 66)** Cresols (m & P isomers)
- **64, 65, & 66)** Cresylic Acid Mixed (o, m, p isomers)
- **64)** O Cresols
- **170)** Nitrobenzene

F005

- **25)** Benzene
- **43)** Carbon Disulfide
- **144)** Isobutanol
- **158)** Methyl Ethyl Ketone
- **206)** Pyridine
- **219)** Toluene

EEI PERMITTED WASTE CODES THAT HAVE SUBCATEGORIES

Codes	Legend #	Subcategory
D001	D1A	High TOC ignitable liquids. ≥10% TOC
	D1B	Ignitable characteristic Wastes except high TOC >10% ignitable liquids
D003	D3A	Reactive Sulfides
	D3B	Other Reactives
	D3C	Water Reactive
	D3D	Reactive Cyanide
	D3E	Explosives
D006	D6A	Cadmium Containing Batteries
D008	D8A	Lead Acid Batteries
D009	D9A	Non-wastewater High Mercury-Organic Subcategory (≥ 260 PPM total Mercury)
	D9B	Non-wastewater High Mercury-Inorganic Subcategory
	D9C	Non-wastewater that contains ≤ 260 mg/kg total mercury (Low Mercury Subcategory)
F003	F3A	Wastes that contain only one or more of the following solvents: carbon disulfide, cyclohexane, and/or methanol
F005	F5A	Wastes that contain only one or more of the following solvents: carbon disulfide, cyclohexane, and/or methanol
	F5B	Contains only 2-Nitropropane
	F5C	Contains only 2-Ethoxyethanol
K069	K69A	Calcium Sulfate (Low Lead)
	K69B	Non-Calcium Sulfate (High Lead)
P092	P92A	Phenyl mercuric acetate non-wastewaters, regardless of their total mercury content, that are not incinerator residues or are not residues from RMERC
	P92B	All phenyl mercury acetate wastewaters
U151	U151A	Non-wastewaters that contain less then 260 mg/kg total mercury and are not residues from RMERC

10 While inspecting the Quality Control Laboratory area, the inspector observed a steel container just outside the Quality Control Lab. The container was labeled as hazardous waste and marked as "QC LAB". An accumulation start date was not observed on this container. (see Photographs 24 & 25) With regard to this container:

(a) Please provide a detailed description of the process or processes which generated the material(s) observed.

After a period of time, the Quality Control Manager will decide that retains from manufacturing batches no longer serve a useful purpose. At that point, retains will be disposed of. These batch retains are poured into this steel container, which was located in a satellite storage area. In addition to these retains, wash solvent is added to this satellite accumulation drum.

(b) Describe the contents of this material observed during EPA's April 2005 CEI, and provide the basis of your knowledge of such contents.

Since all the retains are poured into the same drum, the contents of this container was a combination of the finished products we use. In addition, wash solvent from clean-up activities is added to this drum. This information is based on a discussion with the Quality Control Manager.

(c) State whether a "waste determination" and "LDR determination" was made for the contents of this container.

A waste determination and LDR was made.

(d). If a "waste determination" and "LDR determination" were made for the contents of each of these containers, state when each such determination was made.

The waste determination was made when the Quality Control Manager decided the finished products and wash solvents no longer serve a useful purpose. The LDR was made when material was profiled with TSD.

(e) Were the materials in this container determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste in each of these containers.

The materials were determined to be hazardous waste. The waste codes for this material in the Quality Control Lab were as follows:

D001, D035, F003, F005

(f) State in each case whether the hazardous waste determination was based on generator's knowledge of the process that generated the waste, or on analytical results. If the determination was based on analytical results, provide any and all such results.

Determination is based on generators knowledge of the contents in the container.

(g) Were any of these containers shipped off-site for recycle (i.e., reclaim, reuse), treatment, storage or disposal?

This container was not shipped off-site.

(h) If any of these containers were shipped off-site, provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of any said container.

Does not apply.

11 With regard to the Facility's Hazardous Waste Training Program:

(a) It is the EPA's understanding that the following persons at the Facility were responsible for the management of hazardous waste at the time of the April 12, 2005 CEI: Wayne Underwood, Sam Winkler, Steve Oser, Rudge Butterworth, Jerry Creamer, Shawn Bumbalough, Steve Johnson, James Harrison, Arvind Petit, Wayne Powell, James Rice, Staley Hutton, Matt Gillispie, and Lee Doyle. Please state whether or not the above understanding is correct. If the above statement is not accurate, please describe in detail your reasons as to why such statement is inaccurate and provide documentation supporting any assertion of inaccuracy.

The following employees had primary responsibility for hazardous waste at the time of the April 12, 2005 inspection:
Sam Winkler, HSE Manager,
Steve Oser, Waste Minimization Manager
Wayne Underwood, Waste Coordinator
Rudge Butterworth, Lab Porter

The following employees would have limited responsibility due to being group leaders and Assistant Foremen in waste producing areas:
Jerry Creamer Technical Director
Shawn Bumbalough Water Lab Group leader
Steve Johnson Lacquer Lab Group leader
James Harrison Paint Lab Group leader
Arvind Patel UV Lab Group leader.
Wayne Powell Stain Lab Group Leader
James Rice Stain Dept Assist Foreman
Staley Hutton Paint Dept Assist Foreman
Matt Gillispie Lacquer Dept Assist Foreman
Lee Doyle UV Dept Assist Foreman

Duties and Responsibilities: May generate hazardous waste as a direct result of manufacturing or laboratory activities and/or spills incidental to such activities. Responsibilities include proper handling of hazardous waste, adding to hazardous waste containers in satellite containers and placing materials from satellite areas when full into the less than 90-day storage area for the lab in the absence of the lab porter. Responsible for notifications under the site's Emergency Action Plan.

(b) If any other persons at the Facility, besides those listed in Request No. 10(a) above, are/were responsible for the management of hazardous waste at for the period of April 12, 2005 up to receipt of this letter, please provide the name of each such person. Persons responsible for the management of hazardous waste include, but are not limited to, those persons who label, date, and/or transfer containers of hazardous waste, sign manifests, conduct formal inspections or hazardous waste accumulation areas, fill out hazardous waste reports, and emergency coordinators.

Due to a job change for Rudge Butterworth, Maurice Gordon is now the lab porter with the same assigned duties that Rudge Butterworth had. Due to a job change for Matt Gillispie, Jason Wood now has the job responsibilities that Matt Gillispie had.

(c) During EPA's April 2005 CEI, documented job titles and job descriptions, revised January 4, 2001, were provided for the following employees: Wayne Underwood, Sam Winkler, Steve Oser, Jeff Reynolds, Ernie Johnson and Amy Egan. Please state whether or not the Facility has prepared documented job titles for Rudge Butterworth, Jerry Creamer, Sean Bumbalough, Steve Johnson, James Harrison, Arvind Petit, Wayne Powell, James Rice, Staley Hutton, Matt Gillespe and Lee Doyle. If so, please submit the facility's documented job titles and descriptions for those employees and state such documents were prepared. If not, please state when the facility expects to prepare such documents.

Attached please find the current documented job titles and descriptions for the employees listed above.

(d) State whether or not the facility has documentation stating the amount of introductory and continuing training the Facility requires for those employees responsible for the management of hazardous waste. If so, submit the facility's documentation of the type and amount of both introductory and continuing training, that was in effect at the time of EPA's April 2005 inspection.

The facility does have documentation stating the amount of training required. The attached documentation shows the training that was in effect at the time of EPA's April 2005 inspection.

Hazardous Waste Training
Introductory and Continuing

HSE Manager/ Hazardous Waste Manager Introductory Training

Employee: Sam Winkler

Will receive training on hazardous waste identification and generation, satellite containment area, and accumulation, hazardous waste labeling requirements, RCRA contingency plan, facility communication and alarm systems, facility emergency and evacuation plans, emergency notification requirements, inspection requirements and documentation, land ban requirements. DOT hazardous material training for over the road shipments.

Continuing Training

Refresher RCRA training shall be provided on an annual basis. DOT training on hazardous material will be provided at least every 3 years for over the road shipments

Hazardous Waste Minimization Manager.Introductory Training

Employee Steve Oser

Will receive training on hazardous waste identification and generation, satellite containment area, and accumulation, hazardous waste labeling requirements, RCRA contingency plan, facility communication and alarm systems, facility emergency and evacuation plans, emergency notification requirements, inspection requirements ,and documentation, forklift training, and DOT training

Continuing Training

Refresher RCRA training shall be provided on an annual basis, except that forklift training will be provided in accordance with the requirements of 29 CFR 1910.178. DOT training shall be provided at least every 3 years for over the road shipments or more often in conformance with DOT regulations.

Hazardous Waste Coordinator Introductory Training

Employee Wayne Underwood

Will receive training on hazardous waste identification and generation, satellite containment area, and accumulation, hazardous waste labeling requirements, RCRA contingency plan, facility communication and alarm systems, facility emergency and

evacuation plans, and emergency notification requirements., and forklift training. DOT training for hazardous waste shipments going over the road.

Continuing Training

Refresher RCRA training shall be provided on an annual basis, except that forklift training will be provided in accordance with the requirements of 29 CFR 1910.178. DOT training shall be provided at least once every 3 years for over the road shipments or more often in conformance with DOT regulations.

11e

The employees listed above have had training. The past 3 years training dates were as follows
April 29 2005
December 17, 2004
December 10, 2003

Please see attached sign in sheets

Generator – Manufacturing/Labs

Employee

Jerry Creamer
Sean Bumbalough
Steve Johnson
James Harrison
Arvin Patel
Wayne Powell
James Rice
Staley Hutton
Jason Wood
Lee Doyle

Duties: May generate hazardous waste as a direct result of manufacturing or laboratory activities and or spill incidental to such activities. Responsibilities include proper handling of hazardous waste, adding to haz waste containers in satellite areas. If the waste coordinator or the lab porter is absence these individuals will be responsible for removing haz waste from satellite areas when full to less than 90 day storage area. Containers must be properly labeled when in use and dated when full. May include setting up new satellite containers and keeping satellite drums closed when material is not being added. Responsible for notification under sites EAP

Generator – Manufacturing/Labs

Introductory Training: Manufacturing and Labs will receive training on RCRA requirements and site emergency response procedures.

Continuing Training Refresher training shall be provided on an annual basis.

Hazardous Waste Training
Initial Training
Akzo Nobel Coatings
Roanoke Virginia

RCRA

A. Hazardous Waste Definition

1. Corrosive
2. Reactive
3. Toxic
4. Ignitable (flashpoint less than 140F)

Or because EPA has listed it (Spent solvent)

B. Hazardous Waste Management

Cradle to grave

C. Satellite Accumulation Points

1. Requirements
   a. 55 gallon or less
   b. point of generation
   c. labeled as hazardous waste
   d. Removed to 90 day area within 24 hours of being full

D. Less than 90 Day storage Area

1. Requirements

   a. specific emergency equipment available
   b. Inspected at least once every 7 days with the inspections documented in writing
   c. Comprehensive closure plan to close 90 day location

E. Storage in less than 90 day storage area

1. Labeled with Haz Waste label
2. Dated
3. Clean
4. Shut tightly closed with a gasket

F. RCRA Empty

G. Resource Conservation and Recovery Act

Training Program

1. Who is responsible for waste program

2. Who is required to be trained

.H Procedures for using inspecting repairing and replacing facility emergency and Monitoring equipment

1. Available emergency equipment

I Communications or alarm systems

1. Voice
2. Phone
3. Radio
4. Pull Station
5. Pager System

. J Response to fires or explosions

K Response to groundwater contamination incidents

. L Shutdown of Operations

Hazardous Waste Management Training (Continual)

Generation and Identification

Everyone is a potential generator

Hazardous Characteristics: **Corrosivity**
Reactivity
Toxicity
Ignitability
Contains Spent Solvents (toluene, xylene, MEK,acetone, methanol, acetates, etc)

Not a Waste if it is reusable or until it no longer has a beneficial use

Satellite Accumulation

FOLLOW INSTRUCTIONS ON SATELLITE ACCUMULATION SIGNS

At or near the point of generation
Under the control of an operator
Closed at all times unless adding or removing material
Labeled as Hazardous Waste or marked to identify contents
Dated when full and before filling another drum
Moved to 90 day storage area within 3 days

Less than- 90 –Day Storage

Inspected weekly: **Labeled** (Must be legible and facing outward)
Dated (Not more than 90 days old)
Closed tightly (Rings and bungs tight)
Spaced and above ground (Not sitting in rain water)

Material should be pumped daily into the hazardous Waste Storage Tank

Tanks, piping, Pumps, Valves, and Containment inspected daily:
Good Condition (No leaks, damage)
Overfill/Spill Control Indicators High Level Alarm)

Disposal

Off site within **90 Days** of accumulation start date

Sent to a **RCRA Permitted TSDF** (Treatment, Storage, And Disposal facility)

Disposal Documented by **Uniform hazardous Waste Manifest**

Emergency Preparedness and Response

RCRA regulations require Hazardous Waste Generators to have a **Contingency Plan** that includes

Hazardous Waste Spill Control Plan
Fire and Medical Emergency Plan
Site Evacuation Plan **Fire/Explosion**
Chemical Spill
Civil Disturbance
Natural disaster

Evacuation Procedures and Routes are posted in every building.
It is important to **Be Accounted For** (by your supervisor)

Incidental Spills can be handled by department personnel

Notify Emergency Coordinator for other spills and **All Hazardous Waste Spills**

(e) Please state if hazardous waste training was provided to those employees listed above in Request No. 11(c). If so, please state the date(s) such training took place and submit all RCRA training records the Facility has on file for those employees. In addition, be sure to include a detailed description of the training provided.

The employees listed above have all been trained. We have attached the sign-in sheets from each of the last 3 training sessions. The last three training dates were

April 29, 2005
December 17, 2004
December 10, 2003

The training outline can be found with the response to Request No. 11(d).

(i) If hazardous waste training has not been provided to those employees listed above in Request No. 11(c), please state when Akzo Nobel Coatings plans to provide such training.

Does not apply.

11e

Class Attendance Sign In

Site Security Plan/ RCRA
December 10, 2003
Instructor Sam Winkler

Student	Department	Signature
Agee, Chris	Shipping	
Akers, Bill	Receiving	Bill AKERS
Alls, John	QC Lab	John Alls
Beckner, Mark	Production Mgr	
Bowles, Larry	Stain Dept	
Bradley, Creg	UV Lab	
Bright, Henry	Stain Dept	
Bumbalough, Shawn	Water Lab	
Burgoyne, Scott	QC Lab	
Butterworth Rudge	UV Dept	Rudge Butterworth
Carter, Linda	Shipping Dept	Linda Carter
Creamer, Jerry	R&D Lab	
Cundiff, David	Lacquer Dept	
DeWeese, Bruce	Receiving Dept	
Doyle, Lee	UV Dept	
Eckert, Andrew	QC Lab	
Fisher, Gary	Maintenance	
Floyd, John	Paint Dept	

Foutz, James	**QC Lab**	James Foutz
Frye, David	**QC Lab**	David Frye
Gillispie, Matt	**Lacquer Dept**	
Greenman, Eric	**Water Lab**	
Harrison, James	**Paint Lab**	
Hunt, John	**Paint Dept**	John C. Hunt Jr
Hunt, Luther	**Paint Dept**	
Hutton, Staley	**Paint Dept**	
Isom, Eddie	**Stain Dept**	
Jackson, William	**Lacquer Dept**	
Jackson, Ronnie	**Paint Dept**	
Johnson, Ernest	**Lab**	
Johnson, Steve	**Lacquer Lab**	
Keeling, Clarence	**Lacquer Dept**	
La Fontaine, Steve	**Analytical Lab**	
Lee, Fred	**Stain Lab**	Fred Lee
Legans, Vance	**Paint Dept**	
Lechowich, Ron	**~~Stain~~ PAINT Dept**	
Mackenhimer, James	**Stain Dept**	
Macklin, Brian	**Lacquer Dept**	
Markham, Daryl	**Stain Lab**	
Marsico, David	**Paint Lab**	
McBee, Paul	**Water Lab**	

Stump, Grover	Millehan, Ronald	QC Lab
Tingler, Darnell		
Turner, Ronald	Minnix, David	Stain Lab
Turpin, Greg	Mittelstetter, Toby	Shipping
Tyree, Jason	Moore, Bobby	Paint Dept
Underwood, Wayne	Morris, Alice	Stain Lab
Vandergrift, Al	Mortimer, John	Plant Manager
Via, Julian	Moyers, Bobby	Lacquer Dept
Waldron, Monroe	Oser, Steve	Waste Manager
Winkler, Sam	Overstreet, Daniel	Paint Dept
Wood, Jason	Patel, Arvind	UV Lab
Wood, Ronnie	Persinger, Tim	Stain Dept
Yaunsen, Josh	Poff, Michael	QC Lab
	Powell, Brian	Inventory Mgr
	Powell, Wayne	Stain Lab
	Reynolds, Jeff	Shipping
	Rice, James	Stain Dept
	Ryder, Robert	Stain Dept
	Saunders, Heath	Lacquer Lab
	Saunders, Mark	Grinding Dept
	Schoonover, Dennis	Paint Dept
	Schoonover, Gerald	Receiving Dept
	Scott, David	Shipping Dept

11e

Class Attendance Sign In
Haz Waste and RCRA
December 17, 2004
Instructor Sam Winkler

Student	Department	Signature
Agee, Chris	Shipping	
Akers, Bill	Receiving	
Alls, John	QC Lab	
Beckner, Mark	Production Mgr	
Bowles, Larry	UVDept	
Bradley, Creg	UV Lab	
Bright, Henry	Stain Dept	
Bumbalough, Shawn	Water Lab	
Burgoyne, Scott	QC Lab	
Butterworth Rudge	Lab	
Carter, Linda	Shipping Dept	
Chocklett, Greg	Stain Dept	
Creamer, Jerry	R&D Lab	
Cundiff, David	Lacquer Dept	
DeWeese, Bruce	Receiving Dept	
Doyle, Lee	UV Dept	
Eckert, Andrew	QC Lab	
Fisher, Gary	Maintenance	

Fizer, Mike	**Stain Dept**	Mike Fizer
Floyd, John	**Paint Dept**	
Foutz, James	**QC Lab**	
Frye, David	**QC Lab**	
Gillispie, Matt	**Lacquer Dept**	
Gordon Maurice	**Shipping Dept**	
Greenman, Eric	**Water Lab**	
Harrison, James	**Paint Lab**	
Hively, David	**Analytical Lab**	
Hunt, John	**Paint Dept**	John R Hunt Jr
Hunt, Luther	**Paint Dept**	Luther Hunt
Hutton, Staley	**Paint Dept**	
Isom, Eddie	**Stain Dept**	
Jackson, William	**Lacquer Dept**	
Jackson, Ronnie	**Paint Dept**	
Johnson, Steve	**Lacquer Lab**	
Keeling, Clarence	**Lacquer Dept**	
Lee, Fred	**Stain Lab**	Fred Lee
Legans, Vance	**Paint Dept**	
Lechowich, Ron	**Stain Dept**	
Mackenhimer, James	**Stain Dept**	
Markham, Daryl	**Stain Lab**	
Marsico, David	**Paint Lab**	David Marsico

McBee, Paul	**Water Lab**	
Millehan, Ronald	**QC Lab**	
Minnix, David	**Stain Lab**	
Mittelstetter, Toby	**Shipping**	
Moore, Bobby	**Paint Dept**	
Morris, Alice	**Stain Lab**	
Moyers, Bobby	**Lacquer Dept**	
Oser, Steve	**Waste Manager**	
Patel, Arvind	**UV Lab**	
Poff, Michael	**QC Lab**	
Powell, Brian	**Inventory Mgr**	
Powell, Wayne	**Stain Lab**	
Reynolds, Jeff	**Shipping**	
Rice, James	**Stain Dept**	
Ryder, Robert	**Stain Dept**	
Saunders, Heath	**Lacquer Lab**	
Saunders, Mark	**Grinding Dept**	
Schoonover, Dennis	**Paint Dept**	
Scott, David	**Shipping Dept**	
Stilwell, Guy	**Receiving**	
Stump, Grover	**Lacquer Dept**	
Tingler, Darnell	**Stain Dept.**	

Turner, Ronald	**Stain Dept**	
Turpin, Greg	**QC Lab**	
Tyree, Jason	**Paint Dept**	TUPAC
Underwood, Wayne	**Haz Waste**	
Vandergrift, Al	**Paint Dept**	
Via, Julian	**Maintenance Dept**	
Waldron, Monroe	**Stain Dept**	
Winkler, Sam	**HSE Manager**	
Wood, Jason	**Lacquer Dept**	J Wood
Wood, Ronnie	**Lacquer Dept**	
Yaunsen, Josh	**Stain Dept**	
Levon Turpin	**Office**	
Lisa Bishop	**Office**	
Mary Morris	**Office**	
Teresa Fizer	**Office**	
Janet Neighbors	**Office**	
Francis Lam	**Office**	
Scot Thompson	**Office**	
Pat Harrison	**Lab**	

11e

Class Attendance Sign In
RCRA/Haz Waste
April 29, 2005
Instructor Sam Winkler

Student	Department	Signature
Agee, Chris	Shipping	
~~Akers, Bill~~	Receiving	
Alls, John	QC Lab	John Alls
Beckner, Mark	Production Mgr	
Bowles, Larry	UV Dept	
Bradley, Creg	UV Lab	
Bright, Henry	Stain Dept	
Bumbalough, Shawn	Water Lab	
Burgoyne, Scott	QC Lab	
Butterworth Rudge	Lab	
Carter, Linda	Receiving Dept	Linda Carter
Chocklett, Greg	Stain Dept	
Creamer, Jerry	R&D Lab	
Cundiff, David	Lacquer Dept	
DeWeese, Bruce	Receiving Dept	
Doyle, Lee	UV Dept	
Eckert, Andrew	QC Lab	
Fisher, Gary	Maintenance	

Frye, David	**QC Lab**	David Frye
Gillispie, Matt	**Lacquer Dept**	
Gordon Maurice	**Shipping Dept**	
Greenman, Eric	**Water Lab**	
Harrison, James	**Paint Lab**	
Hively, David	**Analytical Lab**	
Hunt, John	**Paint Dept**	John C. Hunt Jr.
Hunt, Luther	**Paint Dept**	
Hutton, Staley	**Paint Dept**	
Isom, Eddie	**Stain Dept**	
Jackson, William	**Lacquer Dept**	
Jackson, Ronnie	**Paint Dept**	TOTTOO
Johnson, Steve	**Lacquer Lab**	
Jones, Doug	**Paint Dept**	
Keeling, Clarence	**Lacquer Dept**	
Lee, Fred	**Stain Lab**	
Legans, Vance	**Paint Dept**	
Lechowich, Ron	**Stain Dept**	
Mackenhimer, James	**Stain Dept**	
Markham, Daryl	**Stain Lab**	
Marsico, David	**Paint Lab**	
McBee, Paul	**Water Lab**	
Millehan, Ronald	**QC Lab**	

McBee, Paul	**Water Lab**	
Millehan, Ronald	**QC Lab**	
Minnix, David	**Stain Lab**	
Mittelstetter, Toby	**Shipping**	
Moore, Bobby	**Paint Dept**	
Morris, Alice	**Stain Lab**	
Moyers, Bobby	**Lacquer Dept**	
Oser, Steve	**Waste Manager**	
Patel, Arvind	**UV Lab**	
~~**Poff, Michael**~~	**QC Lab**	
Powell, Brian	**Inventory Mgr**	
Powell, Wayne	**Stain Lab**	
Reynolds, Jason	**Stain Dept**	
Reynolds, Jeff	**Stain Dept**	
Rice, James	**Stain Dept**	
Ryder, Robert	**Stain Dept**	
Saunders, Heath	**Lacquer Lab**	
Saunders, Mark	**Grinding Dept**	
Schoonover, Dennis	**Paint Dept**	
Scott, David	**Shipping Dept**	
Stilwell, Guy	**Truck Driver**	
Stump, Grover	**Lacquer Dept**	
Tingler, Darnell	**Stain Dept.**	

Turner, Ronald	**Stain Dept**	Ron Turner
Turpin, Greg	**QC Lab**	Gregory M Turpin
Tyree, Jason	**Paint Dept**	IUPAC
Underwood, Wayne	**Haz Waste**	Wayne Underwood
Vandergrift, Al	**Paint Dept**	Allen Vandergrift
Via, Julian	**Maintenance Dept**	J. J Via
Waldron, Monroe	**Stain Dept**	Monroe Waldron
Wiggins, Jeff	**Stain Dept**	Jeff Wiggins
Winkler, Sam	**HSE Manager**	Sam Winkler
Wood, Jason	**Lacquer Dept**	Jason Wood
Wood, Ronnie	**Lacquer Dept**	R Wood
Yaunsen, Josh	~~**Stain Dept**~~ **Lacquer**	Josh Yaunsen
Levon Turpin	**Office**	
Lisa Bishop	**Office**	
Mary Morris	**Office**	
Teresa Fizer	**Office**	
Janet Neighbors	**Office**	
Francis Lam	**Office**	
Scot Thompson	**Office**	
Pat Harrison	**Lab**	